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Environmental Cleanup Office

## DEPARTMENT OF ECOLOGY

P.O. Box 47600 • Olympia, Washington 98504-7600  
(206) 407-6000 • TDD Only (Hearing Impaired) (206) 407-6006

March 17, 1997

Bill Wedlake  
Spokane County Utilities  
1026 W. Broadway  
Spokane, WA 99260

Dear Mr. Wedlake:

Re: Colbert Landfill/Administrative &amp; Technical Issues

Several issues have surfaced recently. This letter is intended to track the issues and offer constructive comments. The issues and comment follow.

Landfill Closure

Ecology is planning a final inspection of the landfill for the morning of April 3, 1997. Marian Abbett and I will be in attendance. Steve Holderby of the Spokane County Health District and Neil Thompson of the EPA are also planning to attend.

Landfill Trust Fund

It is my understanding that if the inspection is satisfactory, Spokane County plans to make a submittal to Ecology for the balance of the Trust Fund which is approximately \$4.2 million.

Aquifer Management Plan

Ecology has given the plan a preliminary review and passes on the following preliminary comments. Discussion of your response to these comments before or on April 3, 1997 would benefit our resolving this issue.

1. Please provide justification, in terms of measured water levels, for invalidating the intended method of determining operational adjustments and proposing a new method, as described on page 7-9 of the plan.
2. Please provide to the extent possible, some "reference groundwater elevation maps" and "reference flow line analysis" to display the following cases: 1) no operational adjustment is necessary, and 2) operational adjustment is necessary. We do not consider Figure Numbers 12 and 35 in the February 1997 status report to be sufficient to serve as a basis for determining the hydraulic barriers to be adequate. Please note, we are not stating the February 1997 report depicts inadequate barriers.

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3. Although the proposed method of flow line analysis is discussed in Section 7.4, Operational Control, it appears as if the analysis may be used for more than just control adjustments. Please state precisely and completely, the nature of all decisions that are proposed to be made with flow line analysis.
4. Given that the natural fluctuation of the groundwater levels has apparently invalidated the intended method, what assurances can be given that fluctuations will not render a significant amount of error or uncertainty to the proposed method?
5. Please identify on a map only the monitoring wells, or measuring points, to be used in the flow line analysis. If this has already been done, please make the appropriate reference.

Proposed Treatment of Landfill Condensate

It is our understanding that Spokane County proposes to route condensate from the landfill gas collection through the existing, on-site treatment facility. In order for Ecology to evaluate this proposal we would like the following:

1. The rationale and justification for this proposed treatment, including the projected amounts of condensate and the cost for treating and disposing the condensate off-site. *that not dilution!*
2. The analysis results for sampling the condensate that were agreed upon by yourself and Ms. Abbett.
3. A determination of whether or not the condensate is a listed waste under state and federal regulations. ✓
4. Approval of the Local Air Pollution Control Authority.
5. An assessment of the impact to the environment (e.g., air and water) by on-site treatment. In making this assessment, please estimate the type and amount of material that would be added to the Little Spokane River.

Thank you for your cooperation in defining these issues. Ecology looks forward to resolving these issues with Spokane County, and to our inspection and meeting on April 3. If you have any questions regarding this letter, please contact me at (360) 407-7239.

Sincerely



Michael Kuntz  
Toxics Cleanup Program

MK:gj

cc: Marian Abbett, Ecology  
Neil Thompson, EPA